

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No.: 20-10322-CLB

Chapter: 11

NOTICE OF FILING

PLEASE TAKE NOTICE that, in accordance with the Order entered July 9, 2020 [Docket No. 442] *Nunc Pro Tunc* to February 28, 2020, Connors LLP has filed the Monthly Fee Statement of Connors LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Counsel to The Diocese of Buffalo, N.Y., for the Period March 1, 2021 – March 31, 2021, a copy of which is attached hereto and hereby served upon you.

DATED: Buffalo, New York
April 28, 2021

s/ Randall D. White
Randall D. White, Esq.
CONNORS LLP
Special Counsel for Debtor
The Diocese of Buffalo, N.Y.
1000 Liberty Building
Buffalo, New York 14202
(716) 852-5533

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No.: 20-10322-CLB
Chapter: 11

MONTHLY FEE STATEMENT OF CONNORS LLP
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
THE DIOCESE OF BUFFALO, N.Y.
FOR THE PERIOD MARCH 1, 2021 THROUGH MARCH 31, 2021

Name of Applicant:	Connors LLP
Authorized to Provide Professional Services to:	The Diocese of Buffalo, N.Y., Debtor-in-Possession
Date of Retention:	Order entered July 9, 2020 [Docket No. 442] <i>Nunc Pro Tunc</i> to February 28, 2020
Period for which compensation and reimbursement is sought:	March 1, 2021 – March 31, 2021
Amount of compensation sought as actual, reasonable, and necessary:	80% of \$87,795.00 (\$70,236.00)
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$1,256.52

This is a: X monthly ___ quarterly ___ final application.

This is the _____ monthly fee statement of Connors LLP in this case.

CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 27, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203

Invoice#	35421	TMC
Our file#	002700	00006
Billing through		03/31/2021

MISCELLANEOUS MATTERS

PROFESSIONAL SERVICES

03/01/2021	LFQ	(Misc) Telephone conference regarding plan for monitoring priests (1.5); work on pursuing plan regarding above (.6); telephone conference with Independent Diocesan Review Board Chairman (.1); assist with investigation (.4); revise policy regarding intake (.2).	2.80 hrs.	250 /hr	700.00
03/02/2021	LFQ	(Misc) Video conference with Chancery representatives regarding potential for complaint manager (1.5); communications with Independent Diocesan Review Board Chairman and auditor regarding same (0.4); work on notifying District Attorneys of new complaints (1.4); communications with investigator (.3).	3.60 hrs.	250 /hr	900.00
03/02/2021	TMC	(Misc) Confer with priest regarding harassing phone calls that he is receiving from an individual claiming to be affiliated with law firm (.4); review of new litigation documents and forwarding to counsel for the Franciscans (.6); review of various motion documents that were filed in connection with similar cases (.3); email correspondence with the Diocese regarding insurance carrier notification (.3).	1.60 hrs.	250 /hr	400.00

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03/03/2021	LFQ	(Misc) Communications with investigator regarding report (.9); work on response to attorney for priest (.3).	1.20	hrs.	250 /hr	300.00
03/04/2021	LFQ	(Misc) Communications with Chancery and Independent Diocesan Review Board Chairman regarding investigations.	0.40	hrs.	250 /hr	100.00
03/05/2021	LFQ	(Misc) Work on obtaining information for Independent Diocesan Review Board Chairman regarding certain past investigations.	0.90	hrs.	250 /hr	225.00
03/06/2021	LFQ	(Misc) Communications with Independent Diocesan Review Board Chairman regarding various investigations.	0.50	hrs.	250 /hr	125.00
03/08/2021	LFQ	(Misc) Communications with attorney for priest regarding subpoena sent to Diocese (.4); communications with investigator of abuse claims (.3); review report of investigator (.8); communications with Independent Review Board Chairman and Chancery representative regarding investigations of claims against priests whose cases are being sent to Rome (.5).	2.00	hrs.	250 /hr	500.00
03/08/2021	KKS	(Independent Diocesan Review Board) Review and analyze lists of CVA lawsuits and claims for a comprehensive review of those claims that need to be reported to the Review Board.	2.20	hrs.	100 /hr	220.00
03/09/2021	KKS	(Independent Diocesan Review Board) Prepare detailed list of CVA claims in preparation for IDRB.	2.20	hrs.	100 /hr	220.00
03/10/2021	LFQ	(Misc) Communication with the Court and attorney for priest regarding subpoena and protective order (.8);	1.00	hrs.	250 /hr	250.00

		communication with Independent Diocesan Review Board Chairman regarding investigation (.2).			
03/10/2021	TMC	(Independent Diocesan Review Board) Receipt of inquiry from Board Chair regarding recent report on priest.	0.30 hrs.	250 /hr	75.00
03/11/2021	RDW	(Misc) Communication with Diocese regarding investigation of complaint (.4); review of file regarding above (2.0).	2.40 hrs.	250 /hr	600.00
03/12/2021	RDW	(Misc) Continue file review and research regarding prior complaint as requested by Diocese.	1.50 hrs.	250 /hr	375.00
03/16/2021	TMC	(Misc) Providing background information to Bishop Fisher with respect to a survivor/victim who has requested a personal meeting.	0.70 hrs.	250 /hr	175.00
03/18/2021	LFQ	(Misc) Prepare summary of cases involving particular priests including obtaining documents regarding the various claims (2.5); communication with Chancery regarding meeting with victim-survivor (.6); communications with Victim Assistance Coordinator regarding claim (.4); communications with Chancery and other attorneys about reporting matter to Congregation for the Doctrine of the Faith (.3).	3.80 hrs.	250 /hr	950.00
03/18/2021	TMC	(Misc) Obtaining background information for possible meeting by Bishop Fisher with survivor/victim.	0.70 hrs.	250 /hr	175.00
03/19/2021	LFQ	(Misc) Review investigative reports (.8); work on response to subpoena (.9).	1.70 hrs.	250 /hr	425.00
03/19/2021	TMC	(Misc) Email correspondence from Victim Assistant Coordinator regarding interview	0.20 hrs.	250 /hr	50.00

		request from certain survivors/victims.			
03/22/2021	LFQ	(Misc) Communications with Chancery regarding investigations (.6); communications with bankruptcy attorneys regarding subpoena (.5); communications with attorneys involved in the matter giving rise to subpoena (.8).	1.90 hrs.	250 /hr	475.00
03/23/2021	LFQ	(Misc) Communication with attorneys and court personnel regarding subpoenaed records.	1.10 hrs.	250 /hr	275.00
03/24/2021	LFQ	(Misc) Work on proposed court order regarding records and communications regarding same.	1.40 hrs.	250 /hr	350.00
03/25/2021	LFQ	(Misc) Communications with Independent Diocesan Review Board Chairman (.4); work on handling claims (.3); work on subpoena issue (1.4).	2.10 hrs.	250 /hr	525.00
03/25/2021	RDW	(Misc.) Review of file and email to Terrence M. Connors regarding response to Diocese inquiry regarding prior complaint.	0.80 hrs.	250 /hr	200.00
03/26/2021	LFQ	(Misc) Communications with Chancery representatives regarding new information as to certain prior claims (.4); communications with attorneys for victim-survivors regarding same (.7); work on plan to respond to new information (.4); work on subpoena issue (.6); communications regarding same (.2).	2.30 hrs.	250 /hr	575.00
03/29/2021	LFQ	(Independent Diocesan Review Board) Communication with Independent Diocesan Review Board Chairman (.4); communications with investigator (.3); work on responding to inquiry from Chancery (.3); communication	2.70 hrs.	250 /hr	675.00

with Chancery regarding investigations (.4); work on plan for next Independent Diocesan Review Board meeting (1.3).

03/31/2021	LFQ	(Independent Diocesan Review Board) Communications with Independent Diocesan Review Board and Chancery regarding next Independent Diocesan Review Board meeting (.4); communications with investigator (.2); work on agenda in matters to be presented at the next Independent Diocesan Review Board Meeting (2.9).	3.50 hrs.	250 /hr	875.00
03/31/2021	KKS	(Independent Diocesan Review Board) Review new CVA claims and compare to known claims.	1.20 hrs.	100 /hr	120.00

Total fees for this matter \$10,835.00

BILLING SUMMARY

Connors, Terrence M.	Partner	3.50 hrs	250 /hr	875.00
White, Randall D.	Partner	4.70 hrs	250 /hr	1,175.00
Quinlan, Lawlor F. III	Partner	32.90 hrs	250 /hr	8,225.00
Severino, Krista K	Legal Assistant	5.60 hrs	100 /hr	560.00
TOTAL FEES		46.70 hrs		\$10,835.00

DISBURSEMENTS

03/31/2021	POSTAGE	2.00
03/31/2021	COMPUTER RESEARCH - WESTLAW	2.23
Total disbursements for this matter		\$4.23

BILLING SUMMARY

TOTAL FEES	\$10,835.00
TOTAL DISBURSEMENTS	\$4.23
TOTAL CHARGES FOR THIS BILL	\$10,839.23

CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 27, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203
NYSAG SUBPOENA

Invoice#	35422	TMC
Our file#	002700	00040
Billing through		03/31/2021

PROFESSIONAL SERVICES

03/01/2021	LFQ	Work on reviewing and preparing materials to be sent to Attorney General (2.8); video conference regarding same (1.6); communication with Chancery representative regarding responsive material (1.1).	5.50 hrs.	250 /hr	1,375.00
03/01/2021	TMC	Conferring with team to assess the plan for priests who have been credibly accused of abuse and continue to remain in Diocese (.4); confer with outside consultant regarding these issues and the available options and risk reduction strategies (.7); discussing other changes in our policies and procedures at the Diocese regarding compliance with the Charter (.3); conferring with Diocese regarding annual reports for the current audit period and the published reports for 2015 to 2019 (1.3); conferring with Jones, Day regarding the StoneBridge materials and audit and other materials (.7); conferring with attorney Vacco and insurance counsel regarding requests for defense and indemnity (.6); review of 2018 Charter Data Audit attachments from StoneBridge and our response (.6).	4.60 hrs.	250 /hr	1,150.00

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03/02/2021	LFQ	Assist with preparation of materials to be sent to Office of Attorney General by obtaining and providing information about audits and past production (2.4); video conference with Chancery representatives and Jones Day attorneys (1.0).	3.40 hrs.	250 /hr	850.00
03/02/2021	RDW	Review of file and communications with Lawlor F. Quinlan III and paralegal, Krista K. Severino regarding audit documents and information.	0.80 hrs.	250 /hr	200.00
03/02/2021	TMC	Confer with our joint defense team regarding the production of documents and the yearly audits conducted by StoneBridge (.6); confer with former Federal Probation Officer regarding format and protocol to monitor priests who have been credibly accused of child abuse, but no longer have faculties in Diocese and report to Sr. Mary McCarrick (.7).	1.30 hrs.	250 /hr	325.00
03/02/2021	KKS	Confer with Lawlor F. Quinlan III regarding audit documentation (.6); prepare correspondence on previous productions in response to Lawlor F. Quinlan III's request for audit documentation (1.4); prepare Sharefile links regarding CVA claims to their respective district attorney offices and send to Lawlor F. Quinlan III (.2).	2.20 hrs.	100 /hr	220.00
03/03/2021	LFQ	Video conference with team and client (1.0); work on production (1.7); communications with Jones Day attorneys regarding production (.5).	3.20 hrs.	250 /hr	800.00
03/03/2021	TMC	Confer with Diocese regarding update for consideration in communications regarding this matter (.3); confer with Jones, Day regarding the StoneBridge audits and the audit manual (.6);	2.60 hrs.	250 /hr	650.00

confer with Diocese about our suggestions regarding Risk Management/Compliance and the documents we have provided to the Diocese on those topics (.8); reviewing draft response regarding the requests for StoneBridge documents and other material and discussion with our team (.6); discussions with our team regarding protective orders and confidentiality agreements (.3).

03/03/2021	KKS	Prepare various audit documents from the years 2016 through 2020 for production to the OAG (2.3); confer with Lawlor F. Quinlan III regarding the production (.3); confer with litigation vendor regarding OAG production (.6).	3.20 hrs.	100 /hr	320.00
03/04/2021	LFQ	Work on production to be sent to Office of Attorney General.	0.90 hrs.	250 /hr	225.00
03/04/2021	RDW	Review of documents and file regarding priests who are subject of complaint (1.7); email regarding above and strategy (.5).	2.20 hrs.	250 /hr	550.00
03/04/2021	TMC	Preparation for and participation in call with the attorneys for each Diocese in the State of New York and preparation of memorandum to file (.9); preparation of summary memorandum for Bishop Fisher with regard to certain issues that affect each Diocese (.4); conferring with team regarding the status of discovery of certain documents and audit information (.4); further work on our efforts to assemble appropriate material to respond to discovery requests and coordinating same with Jones, Day (.7); reviewing background information in connection with the priests	3.60 hrs.	250 /hr	900.00

referenced in the NYS OAG complaint (.5); providing further information regarding these cases to the joint defense team (.7).

03/04/2021	KKS	Review and analyze charter documentations in the litigation review database in preparation for production to the OAG.	1.50 hrs.	100 /hr	150.00
03/05/2021	TMC	Further work on our document production and privilege review.	0.70 hrs.	250 /hr	175.00
03/07/2021	TMC	Confer with team regarding the motion to remand (.3); further work on our presentation to the Office of Attorney General (.4); email correspondence with Diocese regarding monitoring proposal for credibly accused priests (.3).	1.00 hrs.	250 /hr	250.00
03/08/2021	LFQ	Review letter from Office of Attorney General (.1); communications regarding same (.3); communications regarding monitoring policy requested by Office of Attorney General (.8); begin preparation of material to be sent to Office of Attorney General in response to its letter (2.7).	4.60 hrs.	250 /hr	1,150.00
03/08/2021	TMC	Conference call with Bishop Fisher regarding production of documents (.6); review information regarding respective position of each Diocese regarding the production of documents, privilege issues, and FOIL requests (.8); confer with Sr. Mary McCarrick regarding possible use of a former federal probation officer to monitor priests credibly accused of abuse and the status of the Canon lawyer's preparation of cases to send to Rome (.8); confer with counsel for other diocese regarding their documentation production (.3); additional email	4.50 hrs.	250 /hr	1,125.00

correspondence with Diocese regarding terms and conditions of the monitoring program (.4); conferring with Jones, Day regarding the response to our letter and our proposal for a second meeting (.4); review of the StoneBridge audit materials and expediting production (.3); confer with our team regarding our prior proposal with respect to a risk prevention plan and the implementation of an independent contractor to monitor compliance (.4); receipt and review of coverage report from carrier as to the available insurance coverage for Bishops Malone and Grosz and forwarding same to attorney Vacco (.5).

03/09/2021	LFQ	Communications with attorneys defending Diocese regarding letter from Office of Attorney General and proposed response and details regarding same (1.1); work on our production (3.1).	4.20 hrs.	250 /hr	1,050.00
03/09/2021	TMC	Conference call with team regarding discussions with the Office of Attorney General regarding settlement and document production (.8); confer with team regarding the letter from the Assistant Attorney General (.3); confer with Sr. Mary McCarrick regarding the use of a Canon law firm to forward cases to CDF (.2); confer with Jones, Day team regarding a second meeting with the Office of Attorney General (.3); email correspondence with Diocese regarding media concerns with respect to documents and Office of Attorney General discussions (.4); reviewing most recent changes to the abuse policy (.4);	3.70 hrs.	250 /hr	925.00

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email correspondence with Chair of the Independent Diocesan Review Board regarding changes (.3); reviewing input, edits, and changes offered by Diocesan representatives (1.0).

03/10/2021	LFQ	Draft proposed agreement with Office of Attorney General regarding production (2.0); work on production of documents (4.8).	6.80 hrs.	250 /hr	1,700.00
03/10/2021	RDW	Preparation of non-waiver and non-disclosure agreement (.8); conferences regarding status and strategy (.4).	1.20 hrs.	250 /hr	300.00
03/10/2021	TMC	Preparation for and participation in discussion with our team (.9); follow-up discussion with Jones, Day (.2); further follow-up call with Jones, Day regarding document production and status of discussions with Office of Attorney General (.9); reviewing draft opposition to the motion to remand (.4); draft correspondence to the Office of Attorney General concerning our next settlement meeting (.2); confer with CORE Consultancy regarding the risk compliance program (.4); edit non-waiver agreement (.3); report on issues pertaining to the Office of Attorney General and the document disclosure to Bishop Fisher (.4).	3.70 hrs.	250 /hr	925.00
03/10/2021	KKS	Prepare production of the charter documentation for Lawlor F. Quinlan III (.8); prepare and load the production for the OAG and send to litigation vendor for processing (.4).	1.20 hrs.	100 /hr	120.00
03/11/2021	LFQ	Work on response to Office of Attorney General's request by collecting materials and working on memoranda (5.8); communications regarding same	6.20 hrs.	250 /hr	1,550.00

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		(.4).		
03/11/2021	TMC	Preparation for and participation in conference call with team regarding response to the Office of Attorney General investigation and litigation and relevant issues (.9); further work on non-waiver and NDA agreements (.5); reviewing confidentiality agreements used by other dioceses (.4); review of the approved changes to our Charter policies and procedures (.7); forwarding final versions of revisions to Bishop Fisher (.3); receipt and review of an updated safety plan from Diocese with modifications from consultants (.7); confer with Sr. Mary McCarrick regarding the use of a former Federal Probation Officer to monitor credibly accused priests (.3).	3.80 hrs.	250 /hr 950.00
03/11/2021	KKS	Prepare new order of OAG audit documentation for co-counsel's review.	1.60 hrs.	100 /hr 160.00
03/12/2021	LFQ	Work on production requested by Office of Attorney General (5.2); communications with attorneys defending Diocese regarding same (.9).	6.10 hrs.	250 /hr 1,525.00
03/12/2021	TMC	Gathering information for Jones, Day to help them prepare for their meetings with the Office of Attorney General (.6); email correspondence with team regarding strategy going forward (.4); confer with Lawlor F. Quinlan III regarding the materials requested by the Office of Attorney General and an update for Jones, Day (.3).	1.30 hrs.	250 /hr 325.00
03/12/2021	KKS	Review and analyze database and previous productions for investigator reports in preparation for production to the OAG.	4.60 hrs.	100 /hr 460.00

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03/13/2021	TMC	Conferring with team regarding our response to the Office of Attorney General and request for additional conferences (.4); review of agenda for next discussion with Diocese, including remand process, settlement discussions, and the confidentiality agreement (.7).	1.10 hrs.	250 /hr	275.00
03/15/2021	TMC	Receipt and review of Jones, Day filing in opposition to the Office of Attorney General's motion to remand (.6); email correspondence with team regarding above (.6).	1.20 hrs.	250 /hr	300.00
03/15/2021	KKS	Continue to locate investigative reports in preparation for production to the OAG.	1.40 hrs.	100 /hr	140.00
03/16/2021	RDW	Preparation for upcoming call with team regarding status and strategy.	0.80 hrs.	250 /hr	200.00
03/16/2021	TMC	Conferring with team regarding the implementation of our program to monitor credibly accused sex offenders (.7); conference with Jones, Day team regarding the strategy with respect to settlement discussions (.7); email correspondence with team regarding status reports of the Office of Attorney General discussions and events in other Dioceses (.6).	2.00 hrs.	250 /hr	500.00
03/17/2021	RDW	Preparation for and telephone conference with Jones Day, and Diocese regarding status, strategy, and further handling (1.0); follow-up on call (.4).	1.40 hrs.	250 /hr	350.00
03/17/2021	TMC	Receipt and review of information prepared by Jones, Day with respect to their analysis of the allegations and the applicability of the First Amendment protection (.8); email correspondence with our team responding to questions posed by Bishop Fisher (.4);	1.50 hrs.	250 /hr	375.00

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further discussion with our team regarding documents and the applicable privileges (.3).

03/18/2021	TMC	Preparation for and participation in conference call of all Diocesan attorneys for the State of New York (.7); conferring with our team regarding recent legislation pending in the Senate and status of our monitoring program (.6).	1.30 hrs.	250 /hr	325.00
03/19/2021	LFQ	Work on production requested by Office of Attorney General.	1.70 hrs.	250 /hr	425.00
03/19/2021	KKS	Confer with Lawlor F. Quinlan III regarding documents to be included in upcoming production to the OAG.	0.40 hrs.	100 /hr	40.00
03/20/2021	TMC	Email correspondence from team regarding new program to monitor credibly accused priests; email correspondence with Sr. Mary McCarrick regarding use of investigator .	0.50 hrs.	250 /hr	125.00
03/21/2021	TMC	Email correspondence and follow-up call with former federal law enforcement officer regarding his project and our recommendation of it several years ago with respect to risk assessment and compliance.	0.50 hrs.	250 /hr	125.00
03/22/2021	TMC	Conference call with attorney for other Diocese regarding the status of their discussions with the Office of Attorney General (.9); preparation of memorandum (.2).	1.10 hrs.	250 /hr	275.00
03/22/2021	KKS	Review and analyze investigation reports in preparation for production to OAG.	1.90 hrs.	100 /hr	190.00
03/23/2021	TMC	Reviewing draft letter to the Office of Attorney General concerning our next discussion, as well as a confidentiality agreement (.4); reviewing agenda for upcoming meeting,	1.00 hrs.	250 /hr	250.00

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		including key items (.6).		
03/24/2021	TMC	Preparation for and participation in weekly status conference with members of our team in order to discuss the developments regarding the investigation and issues that affect other Dioceses, including monitoring plan (.9); preparation for and participation in a lengthy conference call with attorney for other Diocese to discuss issues relevant to both of our Dioceses (.8); conference call with Diocese consultant regarding status of the non-waiver agreement and production of documents (.8); further discussion regarding insurance companies and their position with respect to coverage (.4).	2.90 hrs.	250 /hr 725.00
03/25/2021	LFQ	Work on presentation and production requested by Office of Attorney General.	1.40 hrs.	250 /hr 350.00
03/25/2021	RDW	Email to Terrence M. Connors and Lawlor F. Quinlan III regarding strategy and resolution.	0.40 hrs.	250 /hr 100.00
03/25/2021	TMC	Preparation for and participation in conference with other NYS Diocesan attorneys (.6); receiving information from attorney regarding the status of certain matters in other diocese and with the New York State Conference of Catholic Bishops (.2); follow-up call with attorney Vacco concerning status and developments (.7); receipt and review of the remand brief filed by the Office of Attorney General (.6); lengthy email correspondence with Jones, Day on these topics (.7).	2.80 hrs.	250 /hr 700.00
03/25/2021	KKS	Confer with Lawlor F. Quinlan III regarding potential production in response to OAG's	0.90 hrs.	100 /hr 90.00

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		request (.7); prepare same (.2).		
03/26/2021	KKS	Conference call with Lawlor F. Quinlan III regarding a production to the OAG and preparation of same (.2); prepare an index that displays the order and content of Lawlor F. Quinlan III proposed production (1.6).	1.80 hrs.	100 /hr 180.00
03/27/2021	LFQ	Work on production; communications regarding same.	0.50 hrs.	250 /hr 125.00
03/29/2021	LFQ	Communications with attorneys defending Diocese (.3); work on production requested by Office of Attorney General (1.8).	2.10 hrs.	250 /hr 525.00
03/29/2021	TMC	Conferring with team regarding production of documents (.8); reviewing the status of previously produced documents (.3); email correspondence with Sr. Mary McCarrick regarding our review of the policies, procedures of the Diocese, and the current MOU with the District Attorneys for the eight counties (.2); email correspondence with Jones, Day and Diocese regarding meeting and the next agenda (.2).	1.50 hrs.	250 /hr 375.00
03/29/2021	KKS	Confer with Lawlor F. Quinlan III regarding order in which the tentative production to the OAG will appear (.3); review same (OAG production) (.4).	0.70 hrs.	100 /hr 70.00
03/30/2021	LFQ	Communications regarding efforts to resolve lawsuit.	0.70 hrs.	250 /hr 175.00
03/31/2021	LFQ	Conference call with team; work on production in response to Office of Attorney General request.	0.50 hrs.	250 /hr 125.00
03/31/2021	TMC	Preparation for and participation in conference with team to discuss our response to the Office of Attorney General's request for information.	0.60 hrs.	250 /hr 150.00

Total fees for this matter

\$27,990.00

BILLING SUMMARY

Connors, Terrence M.	Partner	48.80 hrs	250 /hr	12,200.00
White, Randall D.	Partner	6.80 hrs	250 /hr	1,700.00
Quinlan, Lawlor F. III	Partner	47.80 hrs	250 /hr	11,950.00
Severino, Krista K	Legal Assistant	21.40 hrs	100 /hr	2,140.00
TOTAL FEES		124.80 hrs		\$27,990.00

BILLING SUMMARY

TOTAL FEES \$27,990.00

TOTAL CHARGES FOR THIS BILL \$27,990.00

CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 27, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203
CHILD VICTIMS ACT

Invoice# 35423 TMC
Our file# 002700 00046
Billing through 03/31/2021

PROFESSIONAL SERVICES

03/01/2021	RDW	Prepare for and conference regarding document production and privilege issues (1.3); preparation of and forward documents to BSK for production (.4); work on identification of additional documents for production, including personnel files (1.8); research and email to co-defense counsel regarding CVA decisions and health and privilege issues (1.3).	4.80 hrs.	250 /hr	1,200.00
03/01/2021	KER	Continue privilege review of priest personnel files (3.2); Meet with Randall D. White regarding potentially privileged documents (.7).	3.90 hrs.	200 /hr	780.00
03/01/2021	KKS	Prepare requested preliminary list concerning alleged abusers (3.2); prepare email regarding list to Lawlor F. Quinlan III and Randall D. White (.3); review and analyze priest personnel files in preparation for production (1.2); update production log (.2); confer with Lawlor F. Quinlan III regarding CVA claims (.2).	5.10 hrs.	100 /hr	510.00
03/02/2021	RDW	Preparation for and emails regarding upcoming call with Diocese and BSK regarding document production issues and possible insurer mediation (1.6); review of newly filed CVA cases	7.50 hrs.	250 /hr	1,875.00

and notification emails regarding above (.7); review of additional email from BSK regarding document production and privilege issues and preparation of detailed response (2.5); continued review of documents for production (2.7).

03/02/2021	TMC	Lengthy conference calls with relevant parties to discuss the production of documents and privilege issues (1.4); reviewing options available to the Diocese (.7).	2.10 hrs.	250 /hr	525.00
03/02/2021	KER	Continue privilege review of priest personnel files.	4.60 hrs.	200 /hr	920.00
03/02/2021	KKS	Review and analyze personnel file in preparation for Randall D. White's review (1.0); review and organize other documents for Randall D. White's review (.7).	1.70 hrs.	100 /hr	170.00
03/03/2021	RDW	Preparation for and telephone conference with Diocese and BSK regarding document production issues (1.7); pre-call email regarding above (.8); emails with BSK and paralegal, Krista K. Severino regarding document production index regarding personnel files (.5); review of filings regarding severance and stay issues (.5); continued review of documents for production (1.5); review of file and email regarding telephone conference with other diocesan counsel regarding document production issues (.7).	5.70 hrs.	250 /hr	1,425.00
03/03/2021	TMC	Preparation for and participation in conference call to discuss privilege issues and discovery (.9); further analysis and working through options (.8).	1.70 hrs.	250 /hr	425.00
03/03/2021	KER	Continue privilege review of priest personnel files.	0.90 hrs.	200 /hr	180.00
03/03/2021	KKS	Prepare production log for BSK	2.00 hrs.	100 /hr	200.00

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reference (.9); review and analyze priest personnel files for production (1.1).

03/04/2021	RDW	Preparation for and participate in NYS diocesan counsel call (.6); follow-up emails to counsel for other diocese regarding document production and privilege issues (.7); receipt and review of confidentiality agreement and protective order regarding Diocese of Rockville Centre (1.7); legal research regarding above (1.0); emails regarding above and application to our case (.7).	4.70 hrs.	250 /hr	1,175.00
03/04/2021	TMC	Reviewing the position of the Diocese of Rockville Centre with respect to the disclosure of records that might be privileged (.6); reviewing the agreement with the creditor's committee that was negotiated by the Diocese of Rockville Centre (.3).	0.90 hrs.	250 /hr	225.00
03/04/2021	KER	Continue privilege review of priest personnel files.	1.20 hrs.	200 /hr	240.00
03/04/2021	KKS	Review and analyze priest personnel files and compare to prior privilege log (1.2); confer with Randall D. White regarding same (.2).	1.40 hrs.	100 /hr	140.00
03/05/2021	LFQ	Assist with document production.	0.40 hrs.	250 /hr	100.00
03/05/2021	RDW	Telephone conference with BSK regarding recent bankruptcy court motion argument and impact on pending state court CVA motions (.5); emails with co-defense counsel regarding above (1.0); review of documents, emails, and conferences regarding document privilege issues and priest personnel file production (1.5); legal research and emails with counsel for other diocese regarding document production	5.90 hrs.	250 /hr	1,475.00

and privilege issues (2.0); emails with co-defense counsel regarding scheduling order issues (.5); correspondence from plaintiff's counsel regarding new complaints (.4).

03/05/2021	TMC	Receiving update on the motion for a stay regarding Lipsitz, Green and developments in Bankruptcy Court (.4); receipt of inquiry from Diocese regarding the status of priest and email correspondence with Diocese (.5).	0.90 hrs.	250 /hr	225.00
03/05/2021	KER	Continue privilege review of priest personnel files.	2.40 hrs.	200 /hr	480.00
03/06/2021	RDW	Review of Syracuse decision regarding preliminary injunction and stay issues and LG cases (.8); emails regarding scheduling order issues (1.2); conference with associate, Kelly E. Riley and emails regarding document production (.4); work on document production (1.0).	3.40 hrs.	250 /hr	850.00
03/06/2021	TMC	Receipt and review of decision of the Syracuse Bankruptcy Court entering a preliminary injunction against the prosecution of Lipsitz, Green cases.	0.40 hrs.	250 /hr	100.00
03/06/2021	KER	Continue privilege review of priest personnel files.	1.90 hrs.	200 /hr	380.00
03/07/2021	RDW	Preparation of requested insurance information and forward to Terrence M. Connors (.5); preparation of analysis of healthcare privilege information and issues (2.0).	2.50 hrs.	250 /hr	625.00
03/07/2021	TMC	Reviewing updated information from insurance coverage lawyer as to available insurance.	0.60 hrs.	250 /hr	150.00
03/08/2021	RDW	Correspondence and emails regarding stay issues and developments (.8); preparation for and telephone conference	5.70 hrs.	250 /hr	1,425.00

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with co-defense counsel regarding healthcare privileges and document production (.7); further research and review of file regarding healthcare and privilege issues (2.0); continued work on document production, including priest personnel files and other files (2.3).

03/08/2021	KER	Continue privilege review of priest personnel files (3.4); meet with Randall D. White regarding potentially privileged documents (0.3).	3.70 hrs.	200 /hr	740.00
03/08/2021	KKS	Prepare various lists regarding alleged abusers per the request of Randall D. White (1.2); confer with him regarding same (.2); review and prepare priest personnel files for production (2.4).	3.80 hrs.	100 /hr	380.00
03/09/2021	LFQ	Work on document production.	3.50 hrs.	250 /hr	875.00
03/09/2021	RDW	Review of new CVA case and emails regarding above (.6); research and preparation for upcoming call regarding document production and healthcare privilege issues (2.7); work on document production, including personnel files (3.2); emails regarding recent inquiry from claimant/victim (.2).	6.70 hrs.	250 /hr	1,675.00
03/09/2021	TMC	Review of recent developments in Bankruptcy Court (.2); review transcript of oral argument before Bankruptcy Court (.7).	0.90 hrs.	250 /hr	225.00
03/09/2021	KER	Continue privilege review of priest personnel files (1.5); meet with Randall D. White (.9).	2.40 hrs.	200 /hr	480.00
03/10/2021	RDW	Preparation for and telephone conference with Diocese, Blank Rome, and BSK regarding document production and privilege issues (1.8); forward documents to BSK for production (.4); work on further	4.70 hrs.	250 /hr	1,175.00

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		document production (2.5).		
03/10/2021	TMC	Preparation for and participation in conference call with bankruptcy counsel regarding the document production issues.	0.80 hrs.	250 /hr 200.00
03/10/2021	KER	Continue privilege review of priest personnel files.	0.40 hrs.	200 /hr 80.00
03/11/2021	RDW	Preparation for and participate in weekly CVA counsel call (.4); preparation for and communications with Diocese regarding additional document production, including personnel files (1.7).	2.10 hrs.	250 /hr 525.00
03/11/2021	TMC	Reviewing the decision and order granting a preliminary injunction against the Lipsitz firm.	0.40 hrs.	250 /hr 100.00
03/12/2021	RDW	Telephone conference and emails with Diocese regarding continued document production, including additional personnel files (.7); file review and preparation for above (1.4); review correspondence from Justice Chimes and forward to co-defense counsel (.2).	2.30 hrs.	250 /hr 575.00
03/15/2021	RDW	Meeting at Diocese regarding document review (1.0); email to Diocese regarding above (.3); review of information from Diocese regarding priests and complaints (.5); review of new CVA case and email from plaintiff's counsel regarding service (.6); email to BSK, Diocese, and Blank Rome regarding above (.5); review of personnel files for privilege and production (1.8).	4.70 hrs.	250 /hr 1,175.00
03/15/2021	KER	Confer with paralegal, Krista K. Severino, regarding upcoming privilege review.	0.30 hrs.	200 /hr 60.00
03/15/2021	KKS	Review and prepare priest personnel files for associate's review (1.3); review and analyze	2.20 hrs.	100 /hr 220.00

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parish files per the request of Randall D. White (.9).

03/16/2021	RDW	Preparation for and review of documents at Diocese (2.0); emails regarding response to plaintiffs' inquiry regarding service (.5); email forwarding Justice Chimes letter to defense counsel (.7); review of personnel files for privilege and production (2.5).	5.70 hrs.	250 /hr	1,425.00
03/17/2021	RDW	Telephone conference with co-defense counsel regarding response to inquiry from plaintiffs' counsel regarding service (.5); review of file and follow up on email to co-defense counsel (.7); review of priest personnel files for privilege and production (2.2).	3.40 hrs.	250 /hr	850.00
03/18/2021	RDW	Begin drafting of non-waiver agreement for possible insurer mediation (3.0); email to Terrence M. Connors and Lawlor F. Quinlan III regarding above (.5); participate in NYS diocesan counsel call (.8); work on document production, including personnel file review (1.8).	6.10 hrs.	250 /hr	1,525.00
03/19/2021	RDW	Review of personnel files for production (3.1); conferences and emails with Lawlor F. Quinlan III and paralegal, Krista K. Severino (.5); telephone conference with Diocese regarding above (.4).	4.00 hrs.	250 /hr	1,000.00
03/20/2021	RDW	Work on document production, including personnel files (1.8); conference with associate, Kelly E. Riley regarding above and review of additional documents (.4).	2.20 hrs.	250 /hr	550.00
03/20/2021	KER	Continue privilege review of priest personnel files (1.5); meet with Randall D. White regarding privilege review process,	1.90 hrs.	200 /hr	380.00

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		completed files, outstanding files and prioritization of the same (.4).		
03/22/2021	RDW	Work on document production, including review of personnel files (4.9); review of newly filed lawsuits (.4); research and telephone conference with Diocese regarding lawsuits (.6).	5.90 hrs.	250 /hr 1,475.00
03/22/2021	KKS	Prepare additional priest personnel files for review.	0.50 hrs.	100 /hr 50.00
03/23/2021	LFQ	Conversation with Chancery representative regarding handling inquiry from attorneys regarding lawsuits.	0.50 hrs.	250 /hr 125.00
03/23/2021	RDW	Preparation of draft non-waiver agreement (2.9); emails with BSK regarding above (1.0); review of privilege log regarding further review of certain documents (1.4); review of priest personnel files for production (2.0); emails forwarding documents to BSK for production (.4); email to Diocese regarding document production (.4).	8.10 hrs.	250 /hr 2,025.00
03/23/2021	TMC	Conference call with survivor/victim who wishes to meet with Bishop Fisher and providing him with the protocol (.3); confer with BSK regarding their non-waiver agreement, health records, and the production of documents to the creditor's committee (.6); prepare for and confer with our team regarding the healthcare records, possible privileges, and production of additional personnel files (1.3); reviewing research with respect to the healthcare privilege (.4).	2.60 hrs.	250 /hr 650.00
03/23/2021	KKS	Review and analyze priest personnel files in preparation for production (2.2); communicate with litigation vendor regarding	2.40 hrs.	100 /hr 240.00

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		same (.2).		
03/24/2021	RDW	Preparation for and conference regarding healthcare privilege project (1.5); preparation of draft non-waiver agreement regarding insurance carrier mediation (3.2); review of documents for production, including personnel files (2.4).	7.10 hrs.	250 /hr 1,775.00
03/24/2021	KLD	Begin review of personnel files regarding health care privilege issues.	0.50 hrs.	100 /hr 50.00
03/24/2021	KKS	Prepare a link to the litigation review platform responsive to certain documents requested by Randall D. White for further review (1.5); confer with paralegal, Karly L. Durst and Randall D. White regarding project (.5).	2.00 hrs.	100 /hr 200.00
03/25/2021	RDW	Preparation for and telephone conference with NYS Diocesan counsel (.4); preparation of draft non-waiver agreement and detailed email forwarding it to BSK (1.0); review of personnel files for production (1.2); emails regarding privilege issues on specific documents (.8); preparation for and conference with associate, Kelly E. Riley regarding above (1.0); preparation for and telephone conference with BSK team regarding status and plan for further document production (1.0); email to Blank Rome regarding documents and potential insurance coverage (.8).	6.20 hrs.	250 /hr 1,550.00
03/25/2021	TMC	Email correspondence regarding Lipsitz motion and discussion on the non-waiver agreement (.7); research on the applicability of non-waiver agreements in the context of insurance coverage and conference with Randall D. White regarding same (.6);	1.90 hrs.	250 /hr 475.00

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discussion and email
correspondence with team
regarding insurance coverage
issues (.6).

03/25/2021	KLD	Continue review of personnel files regarding health care privilege issues.	2.00 hrs.	100 /hr	200.00
03/25/2021	KER	Meet/confer with Randall D. White regarding personnel files, potentially privileged documents, and further privilege review (1.1); review/analyze documents for necessary further redactions (.1); telephone conference with paralegal, Krista K. Severino, regarding necessary redactions and upcoming production (.1).	1.30 hrs.	200 /hr	260.00
03/26/2021	RDW	Numerous emails regarding draft non-waiver agreement for insurance carrier mediation (.8); conference regarding healthcare privilege document project (.4); review of documents for production, including personnel files (3.2); conferences with associate, Kelly E. Riley regarding privilege issues on documents (.6); emails and conferences with associate, Kelly E. Riley and BSK regarding privilege and victim confidentiality issues (.6); forward additional documents to BSK for production (.4); telephone conference with court and co-defense counsel regarding stay issues and information (.4).	6.40 hrs.	250 /hr	1,600.00
03/26/2021	TMC	Email correspondence with BSK regarding their interaction with the insurance carriers and privilege issues (.4); discussing options regarding disclosure to the insurance carriers and creditor's committee and mediation (.5).	0.90 hrs.	250 /hr	225.00

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03/26/2021	KLD	Continue review of personnel files regarding health care privilege issues.	1.60 hrs.	100 /hr	160.00
03/26/2021	KER	Confer with Randall D. White regarding potentially privileged documents (.4); multiple telephone conferences with paralegal, Krista K. Severino, regarding necessary documents for privilege review (.2); continue privilege review of priest personnel files (2.3).	2.90 hrs.	200 /hr	580.00
03/26/2021	KKS	Review and analyze additional priest personnel files for production.	1.40 hrs.	100 /hr	140.00
03/27/2021	RDW	Review of personnel files for production.	2.00 hrs.	250 /hr	500.00
03/28/2021	RDW	Preparation of email regarding document production and related issues.	1.20 hrs.	250 /hr	300.00
03/29/2021	LFQ	Assist with document production.	0.40 hrs.	250 /hr	100.00
03/29/2021	RDW	Continue review of additional personnel files for bankruptcy production (2.9); review of file and email response to BSK inquiries regarding additional personnel files and healthcare privilege issues (1.8); conference with Lawlor F. Quinlan III regarding privilege issues and personnel files (.4); review of new lawsuits and emails to Blank Rome regarding insurance information (1.6); emails regarding additional privilege and production issues (1.0).	7.70 hrs.	250 /hr	1,925.00
03/29/2021	KLD	Continue review of personnel files regarding health care privilege issues.	5.50 hrs.	100 /hr	550.00
03/30/2021	RDW	Review documents at Diocese (2.5); review of follow-up document inquiries from creditors' committee (.7); investigation about creditors' committee inquiries (1.8); emails	5.80 hrs.	250 /hr	1,450.00

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to Blank Rome regarding newly filed lawsuits and insurance issues (.8).

03/30/2021	TMC	Inquiries from bankruptcy counsel regarding the protected health information and applicable privileges.	0.30 hrs.	250 /hr	75.00
03/30/2021	KLD	Continue review of personnel files regarding health care privilege issues.	2.00 hrs.	100 /hr	200.00
03/30/2021	KKS	Review and analyze documents notated in email correspondence from BSK to prepare a link for review (.2); prepare a link to responsive documents requested by Randall D. White (.9); confer with litigation vendor regarding additional priest personnel files (.4).	1.50 hrs.	100 /hr	150.00
03/31/2021	RDW	Review of information regarding priests received from Diocese (.4); review of recent CVA decision regarding discovery (1.0); review of priest personnel files and emails regarding privilege issues (1.8); review of files and documents regarding response to Creditors' Committee document inquiries (1.7).	5.00 hrs.	250 /hr	1,250.00
03/31/2021	TMC	Reviewing recent developments in Bankruptcy Court (.3); confer with team regarding production of documents for the creditor's committee and applicable privileges (.4); email correspondence with attorney for other Diocese regarding favorable CVA decision (.9); lengthy conversation with victim/survivor regarding background information and request for a meeting with Bishop Fisher and preparation of memorandum (1.1).	2.70 hrs.	250 /hr	675.00

Total fees for this matter

\$48,970.00

BILLING SUMMARY

Connors, Terrence M.	Partner	17.10 hrs	250 /hr	4,275.00
White, Randall D.	Partner	137.50 hrs	250 /hr	34,375.00
Quinlan, Lawlor F. III	Partner	4.80 hrs	250 /hr	1,200.00
Riley, Kelly E	Associate	27.80 hrs	200 /hr	5,560.00
Severino, Krista K	Legal Assistant	24.00 hrs	100 /hr	2,400.00
Durst, Karly L.	Legal Assistant	11.60 hrs	100 /hr	1,160.00
TOTAL FEES		222.80 hrs		\$48,970.00

DISBURSEMENTS

03/15/2021	OUTSIDE REPRODUCTION OF DOCUMENTS - AVALON	1,033.21
03/31/2021	COMPUTER RESEARCH - WESTLAW	219.08
	Total disbursements for this matter	\$1,252.29

BILLING SUMMARY

TOTAL FEES	\$48,970.00
TOTAL DISBURSEMENTS	\$1,252.29
TOTAL CHARGES FOR THIS BILL	\$50,222.29